

# EXHIBIT 7

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**From:** LaClair, Jess A (DEC) <jess.laclair@dec.ny.gov>  
**Sent:** Tuesday, December 31, 2024 10:58 AM  
**To:** Hannon, ED [US] (CO)  
**Subject:** EXT :RE: Initial Response to NYSDEC 11/27 PCB/Meta Data Gap Response Letter

Hi Ed,

I hope your holiday break has been enjoyable. I just wanted to check in and see if we are still on track to receive a response from you and your team in early January regarding the data gap sampling plan and any update on the anomaly test pits.

Happy New Year,  
Jess

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**From:** Hannon, ED [US] (CO) <Edward.Hannon@ngc.com>  
**Sent:** Tuesday, December 24, 2024 10:06 AM  
**To:** LaClair, Jess A (DEC) <jess.laclair@dec.ny.gov>; Johnston, Sarah A (DEC) <Sarah.Johnston@dec.ny.gov>  
**Cc:** Pelton, Jason M (DEC) <jason.pelton@dec.ny.gov>; Joel Balmat <jbalmat@verdantas.com>; Rich Poff <rpoff@verdantas.com>; Christina Tuohy <ctuohy@verdantas.com>; Bill Lais <wlais@verdantas.com>; Richard W. Lenz, P.E. (RLenz@oysterbay-ny.gov) <rlenz@oysterbay-ny.gov>; mrusso@OYSTERBAY-NY.gov  
**Subject:** RE: Initial Response to NYSDEC 11/27 PCB/Meta Data Gap Response Letter

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Jess

Thank you for memorializing this clarification we discussed earlier.

Enjoy the holidays!!  
Best Regards  
Ed

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**From:** LaClair, Jess A (DEC) <jess.laclair@dec.ny.gov>  
**Sent:** Tuesday, December 24, 2024 9:06 AM  
**To:** Hannon, ED [US] (CO) <Edward.Hannon@ngc.com>; Johnston, Sarah A (DEC) <Sarah.Johnston@dec.ny.gov>  
**Cc:** Pelton, Jason M (DEC) <jason.pelton@dec.ny.gov>; Joel Balmat <jbalmat@verdantas.com>; Rich Poff <rpoff@verdantas.com>; Christina Tuohy <ctuohy@verdantas.com>; Bill Lais <wlais@verdantas.com>; Richard W. Lenz, P.E. (RLenz@oysterbay-ny.gov) <rlenz@oysterbay-ny.gov>; mrusso@OYSTERBAY-NY.gov  
**Subject:** EXT :RE: Initial Response to NYSDEC 11/27 PCB/Meta Data Gap Response Letter

Ed,

When the Department sent the comment letter on November 27<sup>th</sup> regarding the PCB/metal data gap sampling, it was not the Department's intention to have Northrop Grumman begin sampling in late November 2024. The reference to the

schedule was made simply to indicate the estimated timeframe for completing this work. The Department does not expect sampling to begin until there is an approved sampling plan. The Department also understands that any changes to the Northrop Grumman sampling program will include additional sampling and therefore will extend the schedule as originally laid out.

The Department anticipates receiving a response from Northrop Grumman regarding the comment letter in early January. After the Department has a chance to review the responses, we hope to schedule a meeting in mid to late January to work through any remaining issues so the sampling plan can be finalized and ultimately approved.

If you have any other questions, please let me know.

Enjoy your holidays,  
Jess

**Jessica LaClair, P.E.**

Section Chief, Remedial Bureau D, Section B  
Division of Environmental Remediation  
*Pronouns: She/Her/Hers*

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Department of  
Environmental  
Conservation



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**From:** Hannon, ED [US] (CO) <[Edward.Hannon@ngc.com](mailto:Edward.Hannon@ngc.com)>

**Sent:** Monday, December 23, 2024 2:35 PM

**To:** Johnston, Sarah A (DEC) <[Sarah.Johnston@dec.ny.gov](mailto:Sarah.Johnston@dec.ny.gov)>

**Cc:** Pelton, Jason M (DEC) <[jason.pelton@dec.ny.gov](mailto:jason.pelton@dec.ny.gov)>; LaClair, Jess A (DEC) <[jess.laclair@dec.ny.gov](mailto:jess.laclair@dec.ny.gov)>; Joel Balmat <[jbalmat@verdantas.com](mailto:jbalmat@verdantas.com)>; Rich Poff <[rpoff@verdantas.com](mailto:rpoff@verdantas.com)>; Christina Tuohy <[ctuohy@verdantas.com](mailto:ctuohy@verdantas.com)>; Bill Lais <[wlais@verdantas.com](mailto:wlais@verdantas.com)>; Richard W. Lenz, P.E. (<[RLenz@oysterbay-ny.gov](mailto:RLenz@oysterbay-ny.gov)> <[rlenz@oysterbay-ny.gov](mailto:rlenz@oysterbay-ny.gov)>; [mrusso@OYSTERBAY-NY.gov](mailto:mrusso@OYSTERBAY-NY.gov)

**Subject:** Initial Response to NYSDEC 11/27 PCB/Meta Data Gap Response Letter

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Sarah,

We received the Department's 11/27 comment letter regarding Northrop Grumman's 9/27/24 PCB/metals data gap sampling plan for the Park. As offered, we plan to meet with the Department after we complete our evaluation of the Departments Kriging analysis and proposed soil sampling program provided in your letter. In the meantime, as discussed, the Department verbally confirmed, after sending its 11/27 letter, that it did not expect the data gap sampling activities would have commenced last month. The sentence from your letter that we are referring to is highlighted below:

***“In accordance with the schedule provided by Northrop Grumman on September 27, 2024, the Part 1 of the Data Gap Sampling and Analysis is scheduled to begin in late November 2024 and be completed in April 2025.”***

However, without clarification, this comment implies that Northrop Grumman is expected to conduct the data gap sampling activities per the proposed 9/27/24 OU3 schedule, even though that schedule clearly indicates that it assumes no delays outside of Northrop Grumman's control and provides a list of the key schedule assumptions. At least several key predecessor tasks have been delayed or will be delayed outside of Northrop Grumman's control. These include the protracted regulatory review of Northrop Grumman's proposed data gap sampling plan (as recognized by the Department). Further, the expanded data gap sampling program proposed by the Department, which provides for delineation to unrestricted SCOs, was not anticipated in Northrop Grumman's schedule and will therefore extend the schedule as the details of that expanded delineation are worked out and the resulting agreed upon data gap sampling work plan is prepared and approved.

We would appreciate the Department's written confirmation that it does not or did not expect Northrop Grumman to have commenced with the data gap sampling activities commencing in late November, and that Northrop Grumman's 9/27/24 schedule will need to be adjusted once there is a final, agreed upon data gap sampling work plan. Thank you.

Please let me know if you have any questions.

Happy Holidays and Best Regards

Ed Hannon  
Northrop Grumman

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